

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
)
EBRO REAL ESTATE HOLDINGS, LLC) Judge Eugene Wedoff
)
Debtor and Debtor in Possession.) Case No. 09-10104
)
) Hearing: July 1, 2009 at 9:30 a.m.

NOTICE OF MOTION

To: See attached service list

PLEASE TAKE NOTICE that I will appear on July 1, 2009 at 9:30 a.m., before the Honorable Eugene R. Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present the MOTION TO EXTEND TIME TO FILE PLAN, AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD.

/s/ Forrest L. Ingram
One of Debtor's attorneys

Forrest L. Ingram, P.C.
Forrest L. Ingram #3129032
Peter L. Berk
Patrick F. Lambe
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79 W. Monroe St., Suite 900
Chicago, IL 60603
(312) 759-2838

CERTIFICATE OF SERVICE

I, Patrick Lambe, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document, to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, or fax, as set forth on the attached service list, at or before on June 26, 2009.

/s/Patrick Lambe

SERVICE LIST

Via ECF & Facsimile

U.S. Trustee

William T Neary

Office of the U.S. Trustee, Region 11
219 S Dearborn St, Room 873
Chicago, IL 60604
(312) 886-5794

Bank of America

Robert D Nachman

Dykema Gossett PLLC
10 S. Wacker Dr.
Suite 2300
Chicago, IL 60606
312.627.2302 (fax)

U. S. Small Business Administration

500 W Madison St., #1250
Chicago, IL 60661
Attn: Mary Cvengros
(312) 886-5688

Cook County Treasurer

Law Department
118 N. Clark Street, Room 212
Chicago, IL 60602
(312)603.4147

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MOTION TO EXTEND TIME TO FILE PLAN

Now comes the Debtor and Debtor in Possession, EBRO REAL ESTATE HOLDINGS, LLC (the "Debtor"), by and through its attorneys, Forrest L. Ingram, P.C., and moves this Honorable Court for Extension of Time to File Plan. In support thereof, the Debtor states as follows:

1. Debtor filed its Chapter 11 bankruptcy case on March 24, 2009.
2. On May 5, 2009, this Court entered an order setting the deadline for Debtor to file its plan and disclosure statement as June 29, 2009.
3. Debtor is a single asset real estate entity, owning a property that is leased out to multiple tenants.
4. Debtor has been negotiating with various individuals in an attempt to sell the property, but has yet to obtain a firm offer to purchase.
5. Principles of the Debtor who are vital to these negotiations have been hindered in their ability to complete negotiations because suffered flooding in their personal homes during recent storms, forcing them to delay some negotiations.
6. Debtor is negotiating in good faith with potential buyers and expects to have an offer soon.

7. The plan will consist primarily in liquidating the real estate.
8. Debtor expects to have adequate details to file a plan within two weeks of the current deadline.
9. Debtor respectfully requests this Court to extend the deadline to file a plan to the date of July 13, 2009.

WHEREFORE, the Debtor, Ebro Real Estate Holdings, LLC, respectfully requests that this Honorable Court a) extends the deadline for Debtor to file a plan by two weeks, to the date of July 13, 2009 and b) grant the Debtor such other and further relief as this Court deems just and equitable.

Respectfully submitted,

Ebro Real Estate Holdings, LLC

By: /s/ Forrest L. Ingram
One of its attorneys

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